

Hearing Date: October 6, 2016 at 10:30am (ET)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media LLC, *et al.*,

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

**NOTICE OF MOTION FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)**

PLEASE TAKE NOTICE that St. Paul Fire & Marine Insurance Company (“Travelers”), by and through its undersigned counsel, Putney, Twombly, Hall & Hirson LLP, will move this Court at a hearing to be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Court Judge, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York on the **6th day of October, 2016 at 10:30 a.m.**, or soon thereafter as counsel may be heard, for an Order, pursuant to 11 U.S.C. § 362(d)(1) seeking relief from the automatic stay and granting such other and further relief as to this Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Local Rules of Bankruptcy for the Southern District of New York and the Case Management Order and Procedures in this case, objections, if any, must be filed with the Court and served upon the undersigned so as to be received by the undersigned no later than 4:00 p.m. (ET) on the date that is five (5) days prior to the date of the Omnibus Hearing at which this motion is scheduled to be heard.

Dated: September 2, 2016
New York, New York

Respectfully submitted,

By: /s/ Thomas A. Martin
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TO: Sandeep Qusba, Esq.
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Proposed Counsel to the Official Committee of Unsecured Creditors

Via Federal Express
Chambers of the Hon. Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1418

Via Federal Express

Attn: Greg Zipes and Susan Arbeit
Office of the United States Trustee
Southern District of New York
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, New York 10014

Via CM/ECF

Upon all entities as set forth on The Master Service List
Per Prime Clerk LLC

Gawker Media LLC
114 Fifth Ave, 2nd Floor
New York, New York 10011

Attn: Heather Dietrick

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Debtors

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